

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: *TDS Metrocom*

Contact *Todd McNally*

Telephone Number: 608-441-7959

e-mail: todd.mcnally@tdsmetro.com

Subject Matter Expert (SME): *Todd McNally*

Telephone Number: 608-441-7959

e-mail: todd.mcnally@tdsmetro.com

Authorized Representative: *Rod Cox*

Telephone Number: 608-663-3029

e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: *(short identifier) Transit Rates.*

1. Brief Description: *In June 2003, TDS Metrocom identified that SBC was charging incorrect rates related to Transit activity.*

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

TDS Metrocom discovered this issue in June 2003.

2. How many occurrences and approximately over how long a period of time?
Exact number of occurrences is unknown at this time as we continue to research our invoices to identify additional exceptions. SBC has already acknowledged that they were billing us the incorrect rate for atleast 16 months

3. Is it a recurring problem?
Until we see our July 2003 invoices, we have reason to assume that it is.

4. Your belief as to the cause of the problem.
Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inadequate billing OSS. Specifically as it relates to change management controls.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *TDS Metrocom is not aware of any.*
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*
7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
Yes in June 2003 via written communication with SBC.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?
Yes in June 2003 via written communication with SBC.

3. Last known position of the opposing carrier.
SBC has acknowledged the validity of our claim. We continue to wait and see if the appropriate adjustments get made to our accounts.

4. Were any bill adjustments made to resolve this issue?
Not yet.

5. Were any policies or procedures changed to address this issue? If so, what changes were made?
TDS Metrocom is only aware that SBC has supposedly taken action to correct their billing OSS. Until we see resolution to this issue however, that is only an assumption.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

1. *Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly.*
2. *Provide documentation of SBCs process in place to assure that future exceptions are prevented.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

TDS' issue identifies the matter is as one that only involves Illinois. There are no allegations pertaining to Wisconsin. Accordingly, this issue should be dismissed from this docket.

1. Your belief as to the cause of the problem.
SBC did investigate this issue in Wisconsin and did not find a problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *NA*
3. What performance measures can be implemented to monitor the desired system operation? *NA*
4. Any other pertinent information? *NA*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *See above.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *See above.*
4. Identify any other carrier(s) known to have experienced similar problems. *See above.*
5. Did you identify any other problems arising from or related to this issue? *See above.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *See above.*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *See above.*

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: *SBC*

Contact : *James Jermain*

Telephone Number: *608-252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Diann Thiem*

Telephone Number: *414-223-5830*

e-mail: *dt6856@sbc.com*

Authorized Representative: *Joe Tesson*

Telephone Number: *214-464-3969*

e-mail: *jt5363@sbc.com*

X. Further Investigative Activities <i>(for staff use only)</i>
XI. Final Disposition <i>(for staff use only)</i>

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Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

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II. Directions
<ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
III. Submitting Carrier(s) General Information
<p>Submitted by: <i>TDS Metrocom</i></p> <p>Contact <i>Todd McNally</i> Telephone Number: 608-441-7959 e-mail: todd.mcnally@tdsmetro.com</p> <p>Subject Matter Expert (SME): <i>Todd McNally</i> Telephone Number: 608-441-7959 e-mail: todd.mcnally@tdsmetro.com</p> <p>Authorized Representative: <i>Rod Cox</i> Telephone Number: 608-663-3029 e-mail: rod.cox@tdsmetro.com</p>
IV. Issue Identification
<p>Name: (short identifier) <i>Unexplained Charges.</i></p> <ol style="list-style-type: none"> 1. Brief Description: <i>In July 2003, TDS Metrocom identified charges that do not have explanations as to what they are for other than a description of "Customer Audit Number 2002".</i>
V. Analysis of Issue
<p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered?

TDS Metrocom discovered this issue in July 2003.

2. How many occurrences and approximately over how long a period of time?
Exact number of occurrences is unknown at this time as we continue to research our invoices to identify additional exceptions.

3. Is it a recurring problem?

Yes

4. Your belief as to the cause of the problem.

Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inadequate billing OSS.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *TDS Metrocom is not aware of any.*

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*

7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes in July 2003 via written communication with SBC.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

Yes in July 2003 via written communication with SBC.

3. Last known position of the opposing carrier.

SBC has yet to respond with an explanation of these charges..

4. Were any bill adjustments made to resolve this issue?

Not yet.

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

TDS Metrocom is not aware of any, nor has SBC made us aware of any.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

1. *Provide complete and accurate billing in order for us to validate these and all charges assessed to our account.*

2. *Provide documentation of SBCs process in place to assure that future exceptions are prevented.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.

A USOC was inadvertently left off of two adjustments. Since the bill line item

descriptions are driven by USOC, the adjustment issued without the corresponding description. TDS brought this issue to SBC as an informal inquiry via e-mail. SBC agreed to reverse the adjustments on the two BANs mentioned above and re-issue the billing for the rate elements above with a greater of level of detail. TDS agreed. Based on the additional information TDS provided in response to SBC's questions, we believe this issue is not only closed, but also that it pertains to Illinois, not Wisconsin.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

SBC does not believe this issue to involve an interpretation or application of law.

3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information? *No.*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *TDS agreed to the SBC resolution.*
2. Were any bill adjustments made to resolve this issue? *Yes.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *Via claims adjustment process.*
4. Identify any other carrier(s) known to have experienced similar problems. *None.*
5. Did you identify any other problems arising from or related to this issue? *No.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *SBC is not aware of any other issues relating to this occurrence.*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *No.*

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: *SBC*

Contact : *James Jermain*

Telephone Number: *608-252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Jan Moody*

Telephone Number: *214-576-4486*

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Authorized Representative: *Sue West*

Telephone Number: *312-335-6532*

e-mail: *sw3273@sbc.com*

X. Further Investigative Activities (for staff use only)

XI. Final Disposition <i>(for staff use only)</i>

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Investigation into the Wholesale Billing Practices of
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I. Purpose

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II. Directions

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

III. Submitting Carrier(s) General Information

Submitted by: *TDS Metrocom*

Contact *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Subject Matter Expert (SME): *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Authorized Representative: *Rod Cox*

Telephone Number: *608-663-3029*

e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: *(short identifier) USOC Changes.*

1. *Brief Description: In November 2002, TDS Metrocom identified that certain USOCs associated with collocation rate elements are no longer showing up on our invoice, yet similar elements under different USOCs started to appear, with different rates. It appears that SBC is renaming a rate element under a different USOC and charging a different rate.*

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

TDS Metrocom discovered this issue in November 2002.

2. How many occurrences and approximately over how long a period of time?

Exact number of occurrences is unknown at this time as we continue to research our invoices to identify additional exceptions.

3. Is it a recurring problem?

Yes

4. Your belief as to the cause of the problem.

Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inadequate billing OSS. Specifically as it relates to change management controls.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *TDS Metrocom is not aware of any.*

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*

7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes in October 2002 via written communication with SBC.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

Yes via the Billing Sub Team collaborative.

3. Last known position of the opposing carrier.

SBC initially responded saying that it was due to a tariff change, however we do not purchase these products out of a tariff. We purchase them out of our ICA. Also, the exception is only affecting one of our Michigan collocations.

4. Were any bill adjustments made to resolve this issue?

No

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

TDS Metrocom is not aware of any, nor has SBC made us aware of any.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

1. *Audit to assure that not only accurate rates apply to billing, but also that tariff rates apply when appropriate and ICA rates apply when appropriate.*
2. *Periodic audit to monitor #1 above.*
3. *Provide documentation of SBCs process in place to assure that future exceptions are prevented.*
4. *Provide documentation showing how change management pertaining to rates get implemented into SBCs billing OSS.*
5. *Comparison of different process' followed for retail compared to wholesale as it*

pertains to #4 above.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

TDS' issue description above identifies this as solely a Michigan issue. There are no allegations pertaining to Wisconsin. Accordingly, this allegation should be dismissed from this docket.

A. Analysis of Issue

1. Your belief as to the cause of the problem. *N/A*
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *N/A*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information? *N/A*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *N/A*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Authorized Representative: *Scott VanderSanden*

Telephone Number: *(414) 270-5920*

e-mail: *sv3456@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

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Investigation into the Wholesale Billing Practices of
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II. Directions
<ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
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<p>Submitted by: TDS Metrocom Contact Todd McNally Telephone Number: 608-441-7959 e-mail: todd.mcnally@tdsmetro.com</p> <p>Subject Matter Expert (SME): Todd McNally Telephone Number: 608-441-7959 e-mail: todd.mcnally@tdsmetro.com</p> <p>Authorized Representative: Rod Cox Telephone Number: 608-663-3029 e-mail: rod.cox@tdsmetro.com</p>
IV. Issue Identification
<p>Name: Volume Validation.</p> <ol style="list-style-type: none"> 1. Brief Description: While TDS Metrocom has already identified exceptions to SBCs billing in terms of rates charged, we continue to research the validation of the volume activity that SBC has been billing us.
V. Analysis of Issue
<p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered? This issue continues to be researched and validated by TDS Metrocom.

2. How many occurrences and approximately over how long a period of time? This issue continues to be researched and validated by TDS Metrocom.
3. Is it a recurring problem? This issue continues to be researched and validated by TDS Metrocom.
4. Your belief as to the cause of the problem. This issue continues to be researched and validated by TDS Metrocom.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? This issue continues to be researched and validated by TDS Metrocom.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? High.
7. Any other pertinent information? This issue continues to be researched and validated by TDS Metrocom.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? This issue continues to be researched and validated by TDS Metrocom..
2. Was this issue escalated for dispute resolution? If so, when and in what forum? This issue continues to be researched and validated by TDS Metrocom.
3. Last known position of the opposing carrier. This issue continues to be researched and validated by TDS Metrocom.
4. Were any bill adjustments made to resolve this issue? This issue continues to be researched and validated by TDS Metrocom.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? This issue continues to be researched and validated by TDS Metrocom.

VII. Relief Sought

- 1.) *(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)* This issue continues to be researched and validated by TDS Metrocom.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

SBC understands TDS's issue to be one of a general nature, concerning the volumes contained in the bills rendered by SBC. Given the lack of any specific issue, and the fact that TDS frequently indicates in its Issue Identification that it is still investigating the matter, SBC requests the opportunity to respond should TDS provide additional details at a later date.

A. Analysis of Issue

1. Your belief as to the cause of the problem.
Unable to assess at this time, due to general nature of the allegation.
2. Does this issue involve an interpretation and/or application of law, contract or

tariff? If so, please explain. *Unable to assess at this time.*

3. What performance measures can be implemented to monitor the desired system operation? *Does not appear to be required.*
4. Any other pertinent information? *N/A*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *N/A*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: *SBC*

Contact: *James Jermain*

Telephone Number: *608-252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Peggy Beata*

Telephone Number: *312-335-7340*

e-mail: *mb6432@sbc.com*

Authorized Representative: *Glen Sirles*

Telephone Number: *214-858-0700*

e-mail: *gs1066@sbc.com*

X. Further Investigative Activities (for staff use only)

XI. Final Disposition (for staff use only)

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IV. Issue Identification <p>Name: <i>Defect Report. (TDS-35)</i> Brief Description: <i>TDS Metrocom believes that SBC should be required to publish and manage a defect report that provides notification to all carriers of any billing accuracy discrepancy that SBC identifies, whether it be as a result of a carriers billing dispute claim, or self identified by SBC. This will aid other carriers, as well as SBC, in identifying if other carriers billing is affected by the finding.</i></p>
V. Analysis of Issue <p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered? <i>Idea was first brought up by another carrier</i>

- in a Billing Sub-team collaborative.
2. How many occurrences and approximately over how long a period of time?
Unknown due to lack of such report.
 3. Is it a recurring problem? Unknown due to lack of report.
 4. Your belief as to the cause of the problem. Unknown
 5. Does this issue involve an interpretation and/or application of law, contract or tariff? Not that TDS Metrocom is aware of.
 6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? High.
 7. Any other pertinent information? None at this time.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes at a Billing Sub-Team collaborative earlier this year.
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
Yes at a Billing Sub-Team collaborative earlier this year.
3. Last known position of the opposing carrier. SBCs response to this request to date has been that they will not commit the resources to manage such a report.
4. Were any bill adjustments made to resolve this issue? Not applicable to this issue.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? TDS Metrocom is not aware of any to date, nor has SBC made TDS Metrocom aware of any.

VII. Relief Sought

- 1.) *(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)* TDS Metrocom would like to see SBC develop and manage a defect report as we feel it would benefit all carriers including SBC to identify billing discrepancies as early as possible.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
SBC does not believe a defect report is required. Likewise, SBC is concerned about establishing an additional communication vehicle the CLECs would need to monitor or track. Instead, SBC believes the current Accessible Letter is the appropriate vehicle for communicating any billing issue impacting numerous carriers. SBC has demonstrated its willingness to communicate billing issues to the CLEC community via an Accessible Letter, and it certainly intends to do so in the future. Further, this "issue" is yet another example of TDS attempting to interject issues into this docket that are pending elsewhere.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

Yes. Not all billing disputes are applicable to all CLECs due to the different terms and conditions within each ICA.

3. What performance measures can be implemented to monitor the desired system operation? *None.*

4. Any other pertinent information?

Yes. SBC acts in good faith with CLECs. When SBC identifies a billing error that is broad enough to extend to many CLECs, SBC utilizes the Accessible Letter process to communicate the error and timeframes on the corrective action.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).

The following Accessible Letter was sent when SBC identified inaccurate labeling of the Daily Usage File (DUF). The billing was accurate, therefore no adjustments were made. However, because the (DUF) appeared differently, SBC notified CLECs so they would be aware of the matter and could modify any billing to its customers. This is provided as an example only.



C:\Documents and
Settings\tr5972\My D

4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *No.*

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: *SBC*

Contact: *James Jermain*

Telephone Number: *608-252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Denise Kagan*

Telephone Number: *847-898-4232*

e-mail: *dk9139@sbc.com*

Authorized Representative: *John T. Anderson*

Telephone Number: *314-235-5020*

e-mail: *ja3478@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

III. Submitting Carrier(s) General Information

Submitted by: *TDS Metrocom*
Contact *Todd McNally*
Telephone Number: *608-441-7959*
e-mail: *todd.mcnally@tdsmetro.com*

Subject Matter Expert (SME): *Todd McNally*
Telephone Number: *608-441-7959*
e-mail: *todd.mcnally@tdsmetro.com*

Authorized Representative: *Rod Cox*
Telephone Number: *608-663-3029*
e-mail: *rod.cox@tdsmetro.com*

IV. Issue Identification

Name: *Suspicious Loop Qualification Charges. (TDS-36)*
Brief Description: *It has come to TDS Metrocom's attention SBC is charging us for loop qualification charges that are not only absent from our ICA, but also it appears that we are getting charged for this type of activity on circuits that do not even belong to TDS Metrocom. Conditioning charges that with the migration to LSOG 5, there is no longer an edit in SBC's OSS to reject a DSL order if the loop length, as recorded in SBC's database, is longer than 17,500ft. Due to this missing edit, TDS Metrocom will be required to request Manual Loop Makeup Requests, which it appears that SBC is charging us for, not to mention at rates that are not in our ICA.*

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? August 2003.
2. How many occurrences and approximately over how long a period of time? Unknown at this time.
3. Is it a recurring problem? Unknown at this time as we have just identified this discrepancy in June 2003 invoices.
4. Your belief as to the cause of the problem. TDS Metrocom is left to assume that the cause is due to SBC's inadequate Billing OSS.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? Not that TDS Metrocom is aware of.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? High.
7. Any other pertinent information? None at this time.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes with SBC via email on August 5, 2003.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? Not other than the email sent on August 5, 2003.
3. Last known position of the opposing carrier. SBC has yet to respond to our inquiry about these charges.
4. Were any bill adjustments made to resolve this issue? Not that TDS Metrocom is aware of.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? TDS Metrocom is not aware of any to date, nor has SBC made TDS Metrocom aware of any.

VII. Relief Sought

- 1.) *(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)* TDS Metrocom feels that, at minimum, the following needs to take place:
 - 1) SBC needs provide an explanation of what these charges are for.
 - 2)
 - 3) SBC needs to provide what the source of the rate being charged is from.
 - 4) An audit to verify that SBC is not charging CLECs for activity on circuits that are not even that carriers.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
The NRBXU USOC was retained on the customer's account after initial installation. The NRBXU USOC remains on the CSR for the life of the circuit, although it does not bill any charges. Upon investigation of the orders provided by TDS, SBC found that the only changes made were to the class of service. When the SBC representative issued the orders, they automatically "I"n'd the NRBXU USOC, not realizing it's a one time non-recurring charge, and generated the charges.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. No.
3. What performance measures can be implemented to monitor the desired system operation? No additional performance measures are required.
4. Any other pertinent information?
After reviewing the PON provided by TDS Metrocom, SBC checked its TIRKS and Mortel database and was able to verify that the circuits in question do belong to TDS Metrocom.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
This issue was first identified to SBC via this billing docket and, as such, is the last known position of TDS Metrocom.
2. Were any bill adjustments made to resolve this issue?
Yes. The credits for the Wisconsin claims appear under BAN (redacted) for \$(redacted) ((redacted) adjustments of \$(redacted) each), one for \$(redacted) under BAN (redacted), one for \$(redacted) under BAN (redacted) (these adjustments will appear on their August bills), and one for \$(redacted) under BAN (redacted) (this adjustment will appear on their September bill).
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
Resolution of each claim was sent to TDS by SBC billing dispute representative Jennifer Beyer. File ID (redacted) was sent 8-8-03 (5 items), File ID (redacted) was sent 8-7-03 (1 item), File ID (redacted) was sent 8-8-03 (1 item), and File ID (redacted) was sent 8-8-03 (1 item).
4. Identify any other carrier(s) known to have experienced similar problems. No

other carriers have been identified.

5. Did you identify any other problems arising from or related to this issue?
 - A. NRBXU USOC is a non-recurring USOC that should be a bill-and-drop, and not retained on a customer's account.
 - B. Although the rate is not established on the USOC Rate Table in Wisconsin for TDS, there is a default rate for the MUJ++ Class of Service of \$(redacted).
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
 The USOC Rate Table has a "wildcard" class of service established for the NRBXU USOC in addition to the tariff COS. This wildcard COS was created to perform across the board updates in a short amount of time.
 The tariff rate for NRBXU is '0' for recurring and nonrecurring charges. The wildcard COS rate should have been changed to '0' when the tariff rate was implemented. It was not. MUJ++ is still rated at \$(redacted) for the nonrecurring charge and \$(redacted) for the monthly recurring charge.
 TDS will continue to be incorrectly billed whenever NRBXU is added to a service order in error.
7. Were any policies or procedures changed to address this issue? If so, what changes were made?
 SBC Midwest's Product Management staff is working with CABS to resolve the billing issue by zero-rating the wildcard class of service.

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *James Jermain*
 Telephone Number: *608-252-2359*
 e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Deborah Rhoads*
 Telephone Number: *(214) 858-0206*
 e-mail: *da1927@sbc.com*

Authorized Representative: *Glen Sirles*
 Telephone Number: *214-858-0700*
 e-mail: *gs1066@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose
<i>This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.</i>
II. Directions
<ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
III. Submitting Carrier(s) General Information
<p>Submitted by: <i>TDS Metrocom</i> Contact <i>Todd McNally</i> Telephone Number: <i>608-441-7959</i> e-mail: <i>todd.mcnally@tdsmetro.com</i></p> <p>Subject Matter Expert (SME): <i>Todd McNally</i> Telephone Number: <i>608-441-7959</i> e-mail: <i>todd.mcnally@tdsmetro.com</i></p> <p>Authorized Representative: <i>Rod Cox</i> Telephone Number: <i>608-663-3029</i> e-mail: <i>rod.cox@tdsmetro.com</i></p>
IV. Issue Identification
<p>Name: <i>LSOG 5 Edit. (TDS-37)</i></p> <p>Brief Description: <i>It has come to TDS Metrocoms attention that with the migration to LSOG 5, there is no longer an edit in SBC's OSS to reject a DSL order if the loop length, as recorded in SBCs database, is longer than 17,500ft. Due to this missing edit, TDS Metrocom will be required to request Manual Loop Makeup Requests, which undoubtedly result in loop make up qualification charges that would not have been necessary and this edit been in place within SBCs OSS.</i></p>
V. Analysis of Issue
Please answer the following questions:

1. When this issue was first discovered? July 2003.
2. How many occurrences and approximately over how long a period of time?
Unknown at this time.
3. Is it a recurring problem? Yes.
4. Your belief as to the cause of the problem. TDS Metrocom is left to assume that the cause is due to SBC's inadequate Billing OSS.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? Not that TDS Metrocom is aware of.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? High.
7. Any other pertinent information? None at this time.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes with SBC during a meeting on July 29, 2003.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? Yes with SBC during a meeting on July 29, 2003.
3. Last known position of the opposing carrier. SBC has indicated that there is a fix to restore this "edit" sometime this fall.
4. Were any bill adjustments made to resolve this issue? Not that TDS Metrocom is aware of.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? TDS Metrocom is not aware of any to date, nor has SBC made TDS Metrocom aware of any.

VII. Relief Sought

1.) *(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)* TDS Metrocom feels that, at minimum, the following needs to take place:

- 1) SBC needs provide a firm implementation date of when this "fix" will be in place.
- 2) Provide documentation as to how this edit was missed.
- 3) Provide documentation as to what SBC's process was to cover billing issues related to carriers having to request manual loop make up information due to this missing "edit".
- 4) Adjust carriers invoices for manual loop make up request charges related to this issue.
- 5) Provide documentation as to how SBC will be addressing item #4 above.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.

In November 2002, CR20498 was implemented to bring SBC Midwest in sync with the other three regions, in that LASR will perform the Loop Qualification in Version 5.0 and above. In addition, instead of just receiving Actual Loop Make-Up (LMU), similar to version 4.02, SBC can now receive Manual Loop Requests (MLRs) and Archived LMU. By increasing the events and introducing the sequencing of MLR, Actuals and Archived, SBC's systems were able to accept more CLEC requests mechanically and process them based on additional LMU. At this same time, SBC Midwest stopped receiving the grandfathered ADSL/HDSL and instead received PSD (xDSL) requests. This product is offered at different class levels and is based on specific NC/NCI combinations. It is up to the CLEC to determine the class and their own loop length restrictions. SBC does NOT police the loop length associated with the request; SBC just provisions and inventories loop lengths in the TIRKs system. Therefore, when ordering a PSD loop, SBC's LQ will not reject a loop over 17.5 kft. The only edit SBC will implement is CR10144, which SBC will install in the September 27th release. This CR is YZP specific and will only allow the LSR in the door if the loop is under 17.5kft. Again, this only applies if the request is submitted via the YZP process.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *No.*

3. What performance measures can be implemented to monitor the desired system operation? *N/A*

4. Any other pertinent information? *N/A*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*

2. Were any bill adjustments made to resolve this issue? *No billing adjustments due.*

3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*

4. Identify any other carrier(s) known to have experienced similar problems. *N/A*

5. Did you identify any other problems arising from or related to this issue? *No*

6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*

7. Were any policies or procedures changed to address this issue? If so, what changes were made? *Please see response in item A1.*

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: *SBC*

Contact: *James Jermain*

Telephone Number: *608-252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Deborah Rhoads*

Telephone Number: (214) 858-0206
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Authorized Representative: *Glen Sirles*
Telephone Number: 214-858-0700
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X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*